

1 Zoya Kovalenko (Cal. SBN 338624)
2 13221 Oakland Hills Blvd., Apt. 206
Germantown, MD 20874
678 559 4682
3 zoyavk@outlook.com

4 Plaintiff Zoya Kovalenko

5 LYNNE C. HERMLE (STATE BAR NO. 99779)
lchermle@orrick.com
JOSEPH C. LIBURT (STATE BAR NO. 155507)
jliburt@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025-1015
Telephone: +1 650 614 7400
Facsimile: +1 650 614 7401

6 KATE JUVINALL (STATE BAR NO. 315659)
7 kjuvinall@orrick.com
8 ORRICK, HERRINGTON & SUTCLIFFE LLP
355 S. Grand Ave., Suite 2700
Los Angeles, CA 90071
Telephone: +1 213 629 2020
9 Facsimile: +1 213 612 2499

10 MARK THOMPSON (Admitted *pro hac vice*)
11 mthompson@orrick.com
12 ORRICK, HERRINGTON & SUTCLIFFE LLP
51 W 52nd Street
New York, NY 10019
13 Telephone: +1 212 506 5000
Facsimile: +1 212 506 5151

14 Attorneys for Defendants

15 KIRKLAND & ELLIS LLP, MICHAEL DE
16 VRIES, MICHAEL W. DEVRIES, P.C., ADAM
17 ALPER, ADAM R. ALPER, P.C., AKSHAY
DEORAS, AKSHAY S. DEORAS, P.C., AND
MARK FAHEY

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 OAKLAND DIVISION

21 ZOYA KOVALENKO,

22 Plaintiff,

23 v.

24 KIRKLAND & ELLIS LLP, MICHAEL DE
VRIES, MICHAEL W. DEVRIES, P.C.,
25 ADAM ALPER, ADAM R. ALPER, P.C.,
AKSHAY DEORAS, AKSHAY S.
26 DEORAS, P.C., AND MARK FAHEY,

27 Defendants.

28 Case No. 4:22-cv-05990-HSG (TSH)

**CIVIL LOCAL RULE 6-1(a) STIPULATION
TO EXTEND TIME FOR PLAINTIFF TO
OBJECT/RESPOND TO DEFENDANT
KIRKLAND & ELLIS LLP'S FIRST SETS
OF INTERROGATORIES AND REQUESTS
FOR PRODUCTION**

Assigned to: Hon. Haywood S. Gilliam, Jr.,
Oakland Division

Referred to: Hon. Thomas S. Hixson,
San Francisco Division

1 Plaintiff Zoya Kovalenko (“Plaintiff”) and Defendant Kirkland & Ellis LLP (“Kirkland”)
 2 (collectively, the “Parties”) hereby stipulate under Civil Local Rule 6-1(a) and Federal Rule of
 3 Civil Procedure 29(b) to extend the deadlines for Plaintiff to object/respond to “Defendant
 4 Kirkland & Ellis LLP’s Interrogatories to Plaintiff, Set One” and “Defendant Kirkland & Ellis
 5 LLP’s Request[s] for Production of Documents to Plaintiff, Set One” (collectively, “Kirkland’s
 6 First Sets of Propounded Discovery”) to November 8, 2023. *See* Fed. R. Civ. P. 33(b)(2) &
 7 34(b)(2).

8 Plaintiff’s objections/responses to Kirkland’s First Sets of Propounded Discovery are not
 9 required to be filed or lodged with the Court. *See* Civil L.R. 6-1(a). This stipulated extension will
 10 not alter the date of any event or deadline already fixed by Court order. *See* Civil L.R. 6-1(a); *see*
 11 *also* Fed. R. Civ. P. 33(b)(2) & 34(b)(2); Fed. R. Civ. P. 29(b).¹

12 Dated: October 6, 2023

13 /s/ Zoya Kovalenko
 14 Zoya Kovalenko (Cal. SBN 338624)
 15 13221 Oakland Hills Blvd., Apt. 206
 Germantown, MD 20874
 678 559 4682
 zoyavk@outlook.com

16 Plaintiff

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 24 ¹ Per the Parties’ earlier Civil Local Rule 6-1(a) stipulation, prior to this stipulation, the deadline
 25 for Plaintiff to object/respond to Kirkland’s First Sets of Propounded Discovery was October 9,
 26 2023. Stip. to Extend Time for Pl. to Object/Respond to Def. Kirkland & Ellis LLP’s First Sets
 27 of Interrogs. and Reqs. for Produc. at 1, Dkt. No. 93. The Parties had agreed to discuss an
 28 additional stipulation, as appropriate. *Id.* at 1 & 1 n.1, Dkt. No. 93. This stipulation follows. As
 Plaintiff apprised the Court during the case management conference held earlier this week,
 Plaintiff and her counsel are still trying to retain local counsel so that Plaintiff’s counsel can apply
 to appear *pro hac vice*. *See* Clerk’s Not. Setting Telephonic Case Management Conference, Dkt.
 No. 97; Minutes re [97], Dkt. No. 99; Civil L.R. 11-3(a).

1 Dated: October 6, 2023

ORRICK, HERRINGTON & SUTCLIFFE LLP

2 /s/ Kate Juvinal

3 KATE JUVINAL
kjuvinall@orrick.com
Orrick, Herrington & Sutcliffe LLP
4 355 S. Grand Ave., Suite 2700
Los Angeles, CA 90071
Telephone: +1 213 629 2020
Facsimile: +1 213 612 2499

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7 JOSEPH C. LIBURT (STATE BAR NO. 155507)
jliburt@orrick.com
8 Orrick, Herrington & Sutcliffe LLP
1000 Marsh Road
9 Menlo Park, CA 94025-1015
Telephone: +1 650 614 7400
Facsimile: +1 650 614 7401

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12 MARK THOMPSON (Admitted *pro hac vice*)
mthompson@orrick.com
13 ORRICK, HERRINGTON & SUTCLIFFE LLP
51 W 52nd Street
14 New York, NY 10019
Telephone: +1 212 506 5000
Facsimile: +1 212 506 5151

15 Attorneys for Defendants Kirkland & Ellis LLP,
16 Michael De Vries, Michael W. DeVries, P.C., Adam
17 Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay
S. Deoras, P.C., and Mark Fahey

18

19 **CIVIL LOCAL RULE 5-1(i)(3) ATTESTATION**

20 Pursuant to Civil Local Rule 5-1(i)(3), I attest that the other signatory has concurred in the
21 filing of this document.

22 Dated: October 6, 2023

23 /s/ Zoya Kovalenko

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678 559 4682
zoyavk@outlook.com

25 Plaintiff